

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**DEFENDANT DIGITAL FORENSICS CORPORATION, LLC'S  
RESPONSE TO PLAINTIFFS' MOTION TO COMPEL**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Defendant Digital Forensics Corporation, LLC (“Defendant”) submits its Response to Plaintiffs’ Notice of Motion and Memorandum in Support to Compel Defendants’ Discovery (“Plaintiffs’ Motion to Compel”), and would respectfully show the Court as follows:

1. For the sake of brevity, Defendant refers to, adopts and incorporates those arguments made by the Guerra Defendants in response to Plaintiffs' Motion to Compel.
2. Further, Defendant responded to interrogatories, request for admissions and request for production of documents served on it by Plaintiffs, yet Plaintiffs' motion fails to identify any specific discovery request response which Plaintiffs are challenging. Therefore, it is virtually impossible to respond to Plaintiffs' motion with any specificity. However, Defendant stands by and urges the Court to sustain its objections to each of Plaintiffs' discovery requests.

3. Finally, and as explained by the Guerra Defendants, many of the documents sought by Plaintiffs could be produced to the extent they exist if Plaintiffs would simply enter into an Agreed Confidentiality and Protective Order as previously offered by the Guerra

Defendants. Unless and until such a protective order is in place, Defendant is bound by a confidentiality agreement with the Guerra Defendants and, thus, is prohibited from producing any information that is the subject of that agreement.

WHEREFORE, PREMISES CONSIDERED, Defendant Digital Forensics Corporation, LLC respectfully prays that this Court deny Plaintiffs' Notice of Motion and Memorandum in Support to Compel Defendants' Discovery and grant Defendant such other and further relief, both general and special, at law or in equity, to which it may be entitled.

Respectfully submitted,

By: /s/ J. David Apple  
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**ATTORNEYS FOR DEFENDANT DIGITAL  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 17, 2022, I electronically filed the foregoing document with the Clerk of the Court for the United States District Court, Western District of Texas, San Antonio Division, using the electronic case filing system of the court, which will send a "Notice of Electronic Filing" to the following counsel:

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/s/ J. David Apple  
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